

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Simon Chikhladze,  
Plaintiff,  
v.  
**Government of Georgia,  
Danish Police,  
German Authorities,  
Georgian Law Enforcement Agencies,  
Unidentified Individuals Involved in Organized Crime,  
and Other Responsible Parties**  
Defendants.

Case No.: **2:25-cv-00381-UA**

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| CLERK, U.S. DISTRICT COURT  |
| <b>JAN 14, 2025</b>   |
| CENTRAL DISTRICT OF CALIFORNIA  |
| BY <u>PD</u> DEPUTY   |
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**NO IFP SUBMITTED  
NO CV-30  
NO CV-71**

**COMPLAINT**

**FEE DUE**

**I. INTRODUCTION**

1. I, Simon Chikhladze, file this complaint as a pro se plaintiff seeking redress for violations of my human rights, illegal deportation, torture, and systemic obstruction of my freedom of movement carried out by the Defendants.
2. I allege violations of U.S. federal law, international treaties, and the principles of human rights, including those guaranteed by the Refugee Convention, the European Convention on Human Rights, and U.S. immigration law.
3. I request relief in the form of compensation for damages, accountability for the violations committed, and the opportunity to relocate to a safe third country.

**II. JURISDICTION AND VENUE**

4. This Court has jurisdiction under:
  - 28 U.S.C. § 1331 (federal question jurisdiction) because my claims arise under the Constitution and laws of the United States, including the Fifth Amendment and federal immigration statutes.
  - 28 U.S.C. § 1330 (Alien Tort Statute) because I allege violations of international law, including the prohibition against torture, illegal extradition, and arbitrary detention.

5. Venue is proper in this District under 28 U.S.C. § 1391(b) and (f) because I am a U.S. Person, and the actions of the Defendants implicate U.S. law and foreign policy interests. Furthermore, the Central District of California has jurisdiction over cases involving U.S. residents and their legal protections.

### **III. PARTIES**

#### **6. Plaintiff:**

- I, Simon Chikhladze, am a U.S. Person for banking and taxation purposes and a temporary resident under U.S. immigration law. I have been a victim of grave human rights violations, as outlined in this complaint.

#### **7. Defendants:**

- **Government of Georgia**, including its law enforcement and security agencies, for their role in torture, obstruction of justice, illegal extraditions, and violations of my rights.
- **Danish Police**, for their involvement in my illegal deportation and extraordinary rendition.
- **German Authorities**, for their complicity in my illegal extradition to Georgia.
- **Unidentified individuals**, including organized criminals operating with the knowledge of Georgian authorities, for their role in my torture and mistreatment.

### **IV. FACTUAL BACKGROUND**

8. In 1991, I fled Georgia and sought asylum in the United States. I was granted temporary resident status under U.S. immigration law.

9. In 1998, I left the United States for a vacation in the United Kingdom. Due to circumstances beyond my control, I was unable to return to the U.S. and have since faced systemic persecution.

10. Since 1998, I have suffered the following violations:

- a. **Illegal Deportations:** In 2019, I was illegally deported from Denmark and Germany, despite pending asylum claims and protections under the principle of non-refoulement.
- b. **Torture and Inhumane Treatment:** While residing in Georgia, I have been subjected to torture, physical harm, and psychological abuse by unidentified individuals with the knowledge of Georgian authorities.

c. **Denial of Freedom of Movement:** Georgian authorities have obstructed my ability to leave the country, including theft of my passport and denial of boarding on international flights.

d. **Systemic Obstruction:** Organized criminals at my residence have engaged in acts of torture, surveillance, and intimidation, with apparent protection from local law enforcement.

11. These actions violate my rights under U.S. federal law, international treaties, and the principles of human rights.

## **V. CLAIMS FOR RELIEF**

### **Count I: Violation of the Fifth Amendment – Due Process Clause**

12. Defendants' actions, including illegal deportations and obstruction of due process, violate my Fifth Amendment rights under U.S. law.

### **Count II: Violation of International Law – Refugee Convention and Principle of Non-Refoulement**

13. Defendants violated the principle of non-refoulement, enshrined in the 1951 Refugee Convention, by forcibly returning me to Georgia, where I face persecution and inhumane treatment.

### **Count III: Torture and Inhumane Treatment**

14. Defendants and their agents subjected me to torture and inhumane treatment, in violation of the Alien Tort Statute (28 U.S.C. § 1330) and international law.

### **Count IV: Denial of Freedom of Movement**

15. Defendants obstructed my ability to leave Georgia, in violation of international legal protections and federal statutes governing international air transportation.

## **VI. RELIEF REQUESTED**

I respectfully request that the Court:

1. Declare that the actions of the Defendants violated U.S. and international law.
2. Issue an injunction requiring Defendants to cease all acts of torture, inhumane treatment, and obstruction of my freedom of movement.
3. Order Defendants to facilitate my relocation to a safe third country.
4. Award compensatory and punitive damages in an amount to be determined.

5. Grant any other relief the Court deems just and proper.

**Dated:** January 14, 2025

**Signature:** 

**Printed Name:** Simon Chikhladze

**Address:** 38 Mitskevich Street, Tbilisi 0160, Georgia

**Phone:** +995571598008

**Email:** chosila1952@gmail.com

STATEMENT OF SIMON CHIKHLADZE.

A# 072-019-109

I, Simon Chikhladze, declare the following:

1. Personal Information:

- Name: Simon Chikhladze
- Date of Birth: August 3, 1952
- Place of Birth: Tbilisi, USSR
- Immigration Status: Temporary resident (category C08) since November 1991.

2. Background:

- On January 18, 1998, I left the United States for a two-week vacation in the United Kingdom.
- On January 23, 1998, I recklessly visited Georgian embassy in London to see someone. I was held in Georgian Embassy in London under psychological pressure all day long. All my immigration papers (I-688B, Social Security card, driver's license, etc., including latest INS pending notice dated by October 15, 1997) were copied upon request of the embassy officer. The ticket from London to Tbilisi was promptly bought with corporate credit card by same Embassy employee. In the evening of same day, I was sent to Georgia having in my possession British Airways ticket from London to Washington, D.C.
- I have been unable to return to the United States since then, but I have never abandoned my immigration status, ever.

3. Asylum Attempts:

- On February 11, 2019, I sought political asylum in Denmark but received a negative decision.
- On March 28, 2019, I went to Germany from Denmark seeking protection.
- After a 4.5-month stay in an asylum camp, German authorities conducted my extraordinary rendition from Berlin/Tegel airport back to Copenhagen upon Danish request. I and my sister were placed in prison, as fugitives.

4. Extradition:

- On September 6, 2019, at the age of 67, I was illegally extradited from Ellebæk prison to Georgia upon Georgian request, without any charges against me.

5. Current Situation:

- I have been homeless in Georgia since September 16, 2003.
- I am a victim of grave human rights violations, abuse, torture, and inhumane treatment. These acts are perpetrated by a foreign criminal entity operating at 38 Mitskevich Str., Tbilisi, Georgia.
- This entity is covered up by local authorities in cooperation with foreign actors. Free accommodation, fake legal documentation, and immunity from criminal prosecution are main benefits given to them, not only for their current activity. Some of them participated in "justified" killings of the innocent people in American hotel Encore at Kazbegi Avenue, in Tbilisi (currently, Azerbaijani hotel Saburtalo) and in some other locations during COVID-19 period, although euthanasia is prohibited and other forms assisted killings are prohibited in Georgia.
- The perpetrators hold a firm anti-American stance, which plays a significant role in the torture and mistreatment I am enduring as a U.S. Person. They are aware of my American background.

#### 6. Arbitrary Denial of Leaving the Country:

- I have been denied boarding on Lufthansa flights Tbilisi-Barcelona-Tbilisi on November 16, 2023, and Tbilisi-Geneva-Tbilisi February 29, 2024.
- Unidentified individual with pseudonym "Giviko" played a role in the theft and stealing of my passport and my sister's passport in the eve of departure to the airport, without which we were not allowed on the flight from Tbilisi to Barcelona. Even though we already had boarding passes.
- The Geneva denial was orchestrated by former Chairman of the Georgian Parliament, Nino Burjanadze, in cooperation with her husband, former head of the Georgian border police Badri Bitsadze, and others.
- Their apparent sophistication in monitoring and reprisals against help-seeking also takes on more troubling overtones as potentially state-sponsored actions against a perceived national security threat.

#### 7. Specific Incidents of Abuse and Mistreatment:

- a. Illegal deportation from Germany and Denmark in 2019.
- b. Unlawful detention at Hotel Elit Lux in Tbilisi without proper facilities.
- c. Forced stay in a hospice in Temka neighborhood for four months.
- d. Six months in a German-funded probation facility in Didi Lilo village.

e. Current residence at a location specializing in sleep deprivation and other forms of psychological and mental torture.

8. Request for Help:

- I seek assistance to take necessary action to ensure my safety and well-being. With this mean, my high priority is your assistance to be returned in the United States.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Signed: \_\_\_\_\_.



Date: January 14, 2025